1240414
C0749COH

FACILITY STATUS CHANGE FORM

Date Submitted	Area: 200W	Control Number: D4-REDOX-036
Originator: Daniel Turlington	Facility ID: 2718S	Phone: 509-373-0176

Action Memorandum/Removal Action Work Plan:
DOE/RL-2010-0033, Rev. 0

This form documents the status of facility decontamination, deactivation, decommissioning, and demolition operations or debris removal in accordance with the applicable regulatory decision documents.

Section 1: Facility Status

☒ All D4 operations required by action memo complete.

Description of Completed Activities and Current Conditions:

The required facility removal actions were performed in accordance with the DOE/RL-2010-33, Rev. 0, *Action Removal Work Plan for Central Plateau General Decommissioning Activities.*

2718S was constructed in 1952 in the 200W area south of REDOX. The building was known as the Sand Filter Sample Building (Attachment 1).

Demolition of 2718S was performed during August of 2016. Waste associated with this demolition was characterized under Waste Profile Number WC-PRCIF002 Rev. 4 and WPPRCIF001, Rev. 9, and disposed of at the Environmental Restoration Disposal Facility (ERDF).

The following actions were specifically implemented for 2718S:

- Hazardous substances, if present, were removed from within and around the structure. All hazardous substances removed were characterized and disposed in accordance with waste management Applicable or Relevant and Appropriate Requirements (ARARS) and receiving facility waste acceptance criteria.
- Beryllium sampling indicated no beryllium present, sample number 16-20095-001 and 16-20095-002 (Attachment 2).
- All utility connections (e.g., electrical) were severed at their sources (service point). Connections were also severed at the building entry point at grade.
- All piping was plugged if applicable.
- Historical Preservation and Ecological Resource Evaluations were performed in accordance with National Environmental Policy Act of 1969 requirements to address the impacts of demolition of the site. HCRC#88-200-038, letter #CHPRC-1601608 "Cultural and Ecological Review for the Demolition of Three REDOX Ancillary Facilities and Utility Isolation Outside the REDOX Fence Line" (Attachment 3).
- The 2718S structure is estimated to weigh approximately 11.1 tons.
- Asbestos on or in 2718S was treated as Asbestos Containing Material and shipped to ERDF for disposal.
- Radiation survey RC-1601071 was performed of the building footprint area. No direct or removable contamination was found above CHPRC-00073, table 2-2 removable limits (Attachment 4).
- The structure 2718S was demolished to grade and the slab was partially removed using heavy equipment (e.g. excavators and track hoes).
- All waste generated during demolition was characterized, shipped, and disposed of in accordance with waste management ARARS and WCH-191, *Environmental Restoration Disposal Facility Waste Acceptance Criteria,* as amended.
- Asbestos on or in building 2718S was treated as Asbestos Containing Material and shipped to ERDF for disposal (Attachment 5).

Total Estimated Final Cost for the Facility:

446,776.00

Total estimated cost for this facility will be revised when actuals are available.

FACILITY STATUS CHANGE FORM (continued)

Date Submitted:	Area: 200W	Control Number: D4-REDOX-036

Section 2: Underlying Soil Status

☒ No waste site(s) present. No additional actions anticipated.
☐ Documented waste site(s) present. Cleanup and closeout to be addressed under a separate CERCLA Response Action.
☐ Potential waste site discovered during D4 operations. Waste site identification number <to be> assigned. Cleanup and closeout to be addressed under a separate CERCLA Response Action.

Description of Current/As-Left Conditions:
The 2718S was removed to grade, with partial slab remaining. No safety hazards remain.

Identification of Documented Waste Site(s) or Nature of Potential Waste Site Discovery (as applicable):
N/A

Section 3: List of Attachments

Attachment 1 2718S pictures:
1-Pre Demolition
2-During Demolition
3-Post Demolition

Attachment 2 Beryllium Verification Report for Survey sample number 16-20065-001 and 16-20065-002

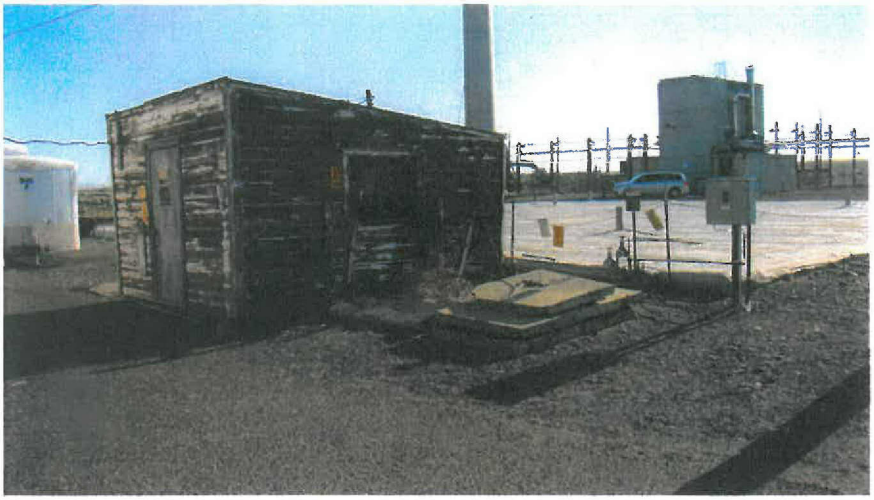
Attachment 3 Historical and Cultural review letter #CHPRC-1601608

Attachment 4 Rad Survey RC-1601071

Attachment 5 EPA Email Concurrence on Asbestos Management

DOE-RL	Wade Woodery (Print)	(Signature)	09/29/2016 (Date)

FACILITY STATUS CHANGE FORM (continued)		
Date Submitted:	Area: 200W	Control Number: D4-REDOX-036



2718S Pre Demolition

2718S During Demolition

2718S Post Demolition

Beryllium Verification Report For
2718S
2/1/2016

Executive Summary

2718S is an equipment/lead shielding storage shed. Verification sampling was conducted on 2718S to confirm that it is beryllium cleared prior to demolition. Based on the sampling results, 2718S can be considered to be beryllium cleared.

Introduction

2718S is as 175 sq. foot storage building that was built in 1952. Verification sampling was conducted to confirm that it is beryllium cleared prior to being demolished.

Sample Strategy & Methodology

Sampling was conducted in accordance with DOE-0342-002. Due to its size, the building is considered to be a small survey unit. Based on its size and past usage, two samples were required by the sampling plan. Due to the deteriorated condition of the building, the two samples were collected from the doors.

Deviations

None.

Results Summary

Results of both samples were below trigger level. One wipe sample collected was below the reporting detection limit (RDL) of 0.025 µg/100 cm^2. The other wipe sample was reported at slightly above the detection limit, with a reading of 0.029 ug/100cm2.

Conclusions/Recommendations

The sample results support a conclusion that the building can be considered beryllium cleared.

References

None.

Signatures

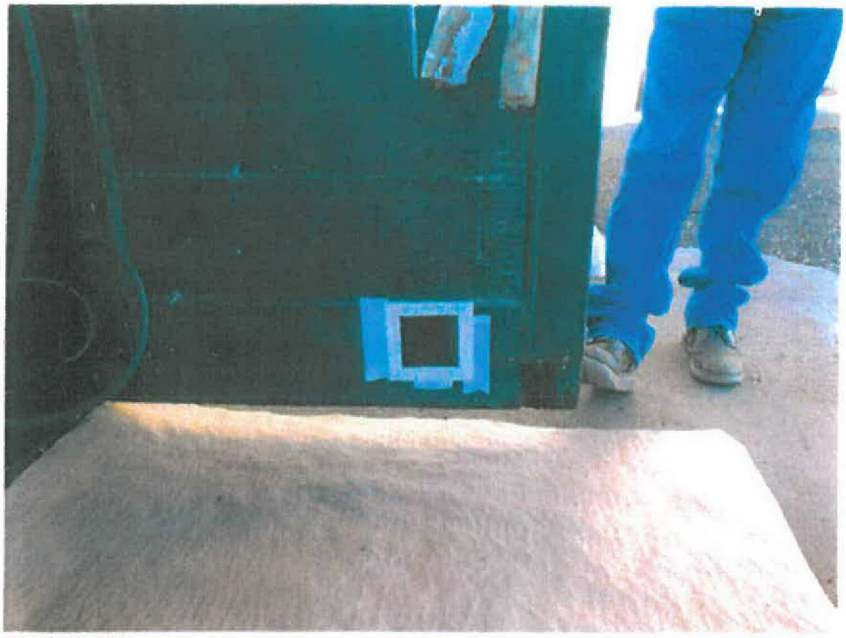
Completed By: Patrick Sagdal, CHST

Reviewed By: Roby Robinson, CIH

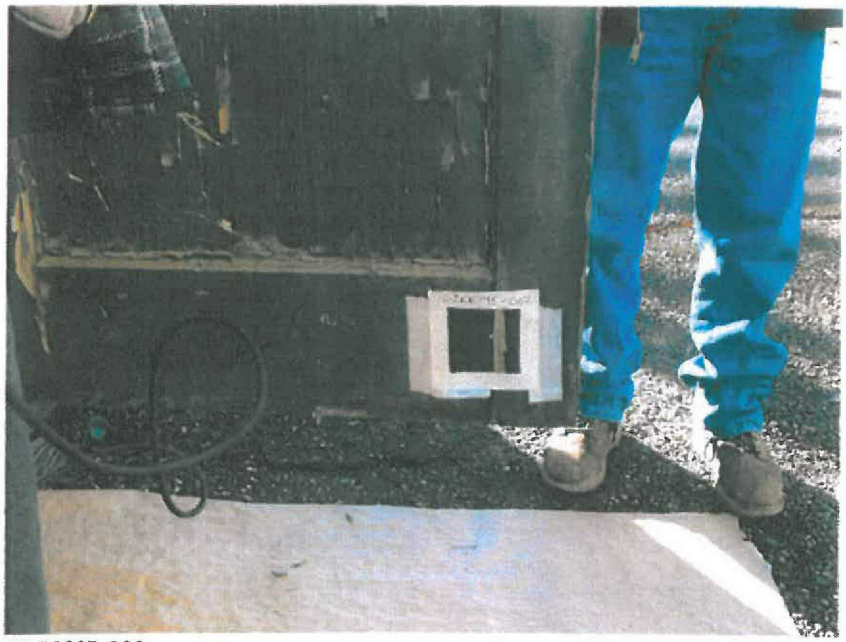
Attachments

1. Sample Location Photos
2. Beryllium Verification Sampling Plan
3. Summary of Data

Attachment 1



16-20095-001



16-20095-002

BERYLLIUM CHARACTERIZATION/VERIFICATION SAMPLING PLAN

Job Information:

a) Title:	**Beryllium Characterization/Verification Sampling of 2718S**
b) Location:	200W
c) Purpose:	☐ Complete Characterization ☐ Partial Characterization ☒ Verification Sampling

Identified Survey Units:
1 survey unit - Sand Filter Sample Building (184 ft²)

Survey Unit	Historical Sample Data	Identified Sample Locations ADD ROW	Required Number of Sample Points For Survey Unit
Sand Filter Sample Building	None	Interior of two doors (west and north)	2

Personal Protective Equipment:
Latex or nitrile gloves, safety glasses with side shields, substantial footwear.

Work Practices:
Building Administrator contact information
- Darin Cornell /509.376-1743/509.438-7819 (cell)

Building Specific Hazards and Controls (lighting, support personnel needs, etc.)
The building is a radiological contaminated area and structurally unsafe to enter. Sampling shall be performed by opening up and sampling the interior of the doors without stepping into the building. Follow instructions specified in the RWP, if one is required for the task.
- Biological hazards may be present due to the condition of the building.

BERYLLIUM CHARACTERIZATION/VERIFICATION SAMPLING PLAN

Prior to sampling conduct a Pre-Job Briefing. Review:
- Emergency Response Actions
- General Hazard Analysis
- PPE and Work Practices Section of Sampling Plan
- Incipient Hazards such as weather
- Injury/Accident reporting
- Radcon shall survey the surfaces and/or those adjacent to determine if the samples are radiological contaminated.

Other:
- Ensure that the Building Administrator authorizes the sampling evolution to occur and releases work.
- Sampling must be conducted by an IHT.

Sample Analysis:

☒ Beryllium is only analyte

☐ Other metals required with Beryllium (list metals)

N/A

☐ Special analysis required (provide details)

N/A

Comments/Deviations:

N/A

Prepared By: Print Name		Signature	12/16/15 Date
Approved By: Print Name		Signature	12 DEC 2015 Date

Attachment 3

Sample Data Tables/Summary of Data

Table 1. 2718S Beryllium Surface Sample Analytical Results

Sample Number	Sample Date	Sample Result ($\mu g/100\ cm^2$)	Control Level ($\mu g/100\ cm^2$)	Sample Location
16-20095-001	01/20/2016	<0.025	0.2	Inside of north door.
16-20095-002	01/20/2016	0.029	0.2	Inside of west door.

CH2MHILL
Plateau Remediation Company

INTEROFFICE MEMORANDUM

CHPRC-1601608

Date: April 12, 2016

To: D. R. Corriell, Director, Central Plateau Surveillance & Maintenance
E. A. Prichard, Project Manager, Decommissioning & Remediation Project

From: L. M. Dittmer, Subject Matter Expert, NEPA/SEPA/Cultural/Ecological
D. R. Turlington, Environmental Compliance Officer, Central Plateau Surveillance & Maintenance

lmd 4/12/16
drt 4/12/16

Subject: CULTURAL AND ECOLOGICAL REVIEW FOR THE DEMOLITION OF THREE REDOX ANCILLARY FACILITIES AND UTILITY ISOLATION OUTSIDE THE REDOX FENCE LINE

Reference: Letter, A. L. Johnson, MSA, to L. M. Dittmer, CHPRC, "Ecological and Cultural Clearance for Confirmation Sampling of the LLBG FS-1 Outdoor Container Storage Area, 200 West Area, Hanford Site, (HCRC#88-200-038, ECR-2015-243), MSA-1501895/CHPRC, dated April 28, 2015.

The scope of this project includes demolition and removal of three small support buildings near the REDOX facility. These buildings are in a highly disturbed area, and all work will take place above grade with the exception of minor excavation for utility isolation at 2718-S, and possibly also at 2710-S. It will not expand beyond the original excavation that was completed to install the utility lines. These are shallow, small diameter lines that will require minimal excavation to locate and isolate. Due to the highly disturbed nature of this area, the subsurface that will be excavated consists of fill material from the original installation of the utility lines. Therefore, cultural artifacts or items of historical interest are not expected in this location. Any unexpected items that might be discovered would have been placed in this location during the backfill following installation of the water line; hence, workers shall be instructed to be aware of this potential during the excavation.

This memorandum documents a review for compliance with Plateau Remediation Contract requirements for the following:

- The ecological resources evaluation conducted by the Environmental Compliance Officer (ECO);
- Provides the required instructions to staff who will be performing the work, for awareness of the need to protect cultural/historic artifacts and migratory birds, as well as the required response should these items be identified during the performance of the project; and
- Documentation that the scope of the action is covered by reviews that have been completed under Section 106 of the National Historic Preservation Act of 1966, As Amended (Section 106) to satisfy the cultural resource review requirement.

This conclusion is consistent with the Ecological and Cultural Clearance for Sampling at the LLBG FS-1 Storage Area in 200 West (reference).

Cultural Evaluation

The cultural review number for this is HCRC #88-200-038, based on the following:

In 1990, a Cultural Resources Review was conducted for Hanford Site operations and cleanup activities within the 200 East and 200 West Areas. The Archaeological Survey of the 200 East and 200 West Areas, Hanford Site, Washington (HCRC#88-200-038) considered potential impacts to historic properties from Hanford operations within the 200 Areas (Chatters and Cadoret 1990). The finding reached is that no historic properties would be impacted as a result of on-going operations and cleanup within the 200 West Area, with the exception of the old White Bluffs Road that crosses the northwest corner, and that no additional Section 106 reviews are necessary to maintain this finding (Chatters and Cadoret 1990). Because Section 106 requirements have been previously met, no additional review of the project is required.

There is no evidence in this area of historic use/occupation, or areas of cultural importance on or near the site. Extensive disturbance of this area during the installation of water lines and other utilities, as well as nearby structures, has left no material evidence of a historic nature that could be observed at the work site.

DOE/RL-96-77, *Programmatic Agreement Among the U.S. Department of Energy, Richland Operations Office, the Advisory Council on Historic Preservation, and the Washington State Historic Preservation Office for the Maintenance, Deactivation, Alteration, and Demolition of the Built Environment on the Hanford Site, Washington* (PA), addresses the built environment constructed during the Manhattan Project and Cold War Era periods of Hanford's operational history, encompassing the years 1943 through 1990. The PA directed that a Sitewide Treatment Plan be developed to identify, inventory, and evaluate all undertakings which may affect historic buildings and structures on the Hanford Site, and identifies those that require mitigation measures to preserve historic, architectural, and technological values.

RL, in consult with the Advisory Council on Historic Preservation and the State Historic Preservation Office (SHPO), developed DOE/RL-97-56, *Hanford Site Manhattan Project and Cold War Era Historic District Treatment Plan* (Sitewide Treatment Plan) to preserve the history of the site. The Sitewide Treatment Plan lists representative buildings and structures that require mitigation (identification, removal, preservation of historically significant artifacts). The Sitewide Treatment Plan only covers the historic preservation procedures for the buildings/structures themselves, and 2710-S, 2711-S, and 2718-S are on the *Non Contributing/Exempt Properties* list. Therefore, these buildings are not included in the Sitewide Treatment Plan as a candidate for mitigation. The PA stipulates, in Section IV.F.; "For those properties for which no mitigation is required under the Sitewide Treatment Plan, RL and SHPO agree that no further communication or notification is necessary."

Prior to initiation of this project, all project staff will be trained to be aware of potential cultural or historical artifacts that may be encountered, and the following language will be included in the project work package:

> If any cultural materials, including but not limited to stone tools, flakes, bones, shells, bottles, subsurface foundations, are discovered during the demolition of 2710-S, 2718-S, or 2711-S and associated utility isolation, work in the vicinity of the discovery shall cease, and workers will contact the project ECO. The ECO will contact a cultural resource professional (e.g., archaeologist, historian), who will assess the significance of the find, and if necessary, arrange for the mitigation of the find.

Any required mitigation will take place in accordance with the Sitewide Treatment Plan and stipulation IV.D of the Programmatic Agreement.

This clearance was discussed with Ray Swenson and Rick Engelmann, and they agree that it is appropriate to use HCRC#88-200-038 as the cultural clearance for this work.

Ecological Resources Evaluation - 2710S Inert Gas Generator, 2711S Stack Gas Monitoring Building and the 2718S Sand Filter Sample Building Work Location

CHPRC Environmental Staff performed a pedestrian survey of the 200W REDOX Ancillary work Location 1, on 11/30/15 and again on 2/18/16. The area consists of a severely disturbed location that has been excavated and backfilled with construction grade fill/gravel. The location lies immediately adjacent and within the footprint of the 202-S REDOX Canyon Facility. There is significant and complete disturbance of soils as result of the original construction of the 202-S structure and numerous support facilities such as foundations for ancillary buildings and tank farms.

Regular and periodic maintenance of this industrial setting has included vegetation control via herbicide application by MSA. Therefore, the entire Area of Concern is void of vegetation.

No plant or animal species protected under the Endangered Species Act, candidates for such protection, or species listed by the Washington State government as threatened or endangered were observed in the vicinity of the proposed project site (see attached photos).

There is always the potential for birds to nest within the project area on the ground, on buildings, or equipment. The nesting season on the Hanford site is typically from mid-March to mid-July. Active nests (containing eggs or young) of migratory birds are protected by the Migratory Bird Treaty Act (MBTA) of 1918. The MBTA makes it illegal for people to "take" migratory birds, their eggs, feathers, or nests. Take is defined in the MBTA to include by any means or in any manner, any attempt at hunting, pursuing, wounding, killing, possessing, or transporting any migratory bird, nest, egg, or part thereof. Prior to initiation of this project, all project staff will be trained, and the following language will be included in the project work package:

CHPRC-1601608

Personnel working on this project must watch for nesting birds. If any nesting birds (if not a nest, a pair of birds of the same species or a single bird that will not leave the area when disturbed) are encountered or suspected, or bird defensive behaviors (flying at workers, refusal to leave area, strident vocalizations) are observed within the project area, pause work and contact the project ECO to evaluate the situation.

A site walkdown performed by an ECO is required immediately prior to the commencement of D4 activities for a final evaluation of the work site for environmental concerns.

No adverse impacts are anticipated from the proposed project if these recommendations are followed.

Provided as an attachment to this memorandum is a schematic of the three buildings to be demolished, including the locations of the utility isolations, as well as three photos, 1) 2710S Inert Gas Generator, 2) 2711S Stack Gas Monitoring Building, 3) 2718S Sand Filter Sample Building.

Lorna M Dittmer for
R. H. Engelmann, Manager
Technical Services, Environmental Protection
Environmental Program & Strategic Planning
4/12/2016
Date

Lorin N Clements for
B. J. Dixon, Director
Environmental Compliance
K Basin Operations & Plateau Remediation
4/12/2016
Date

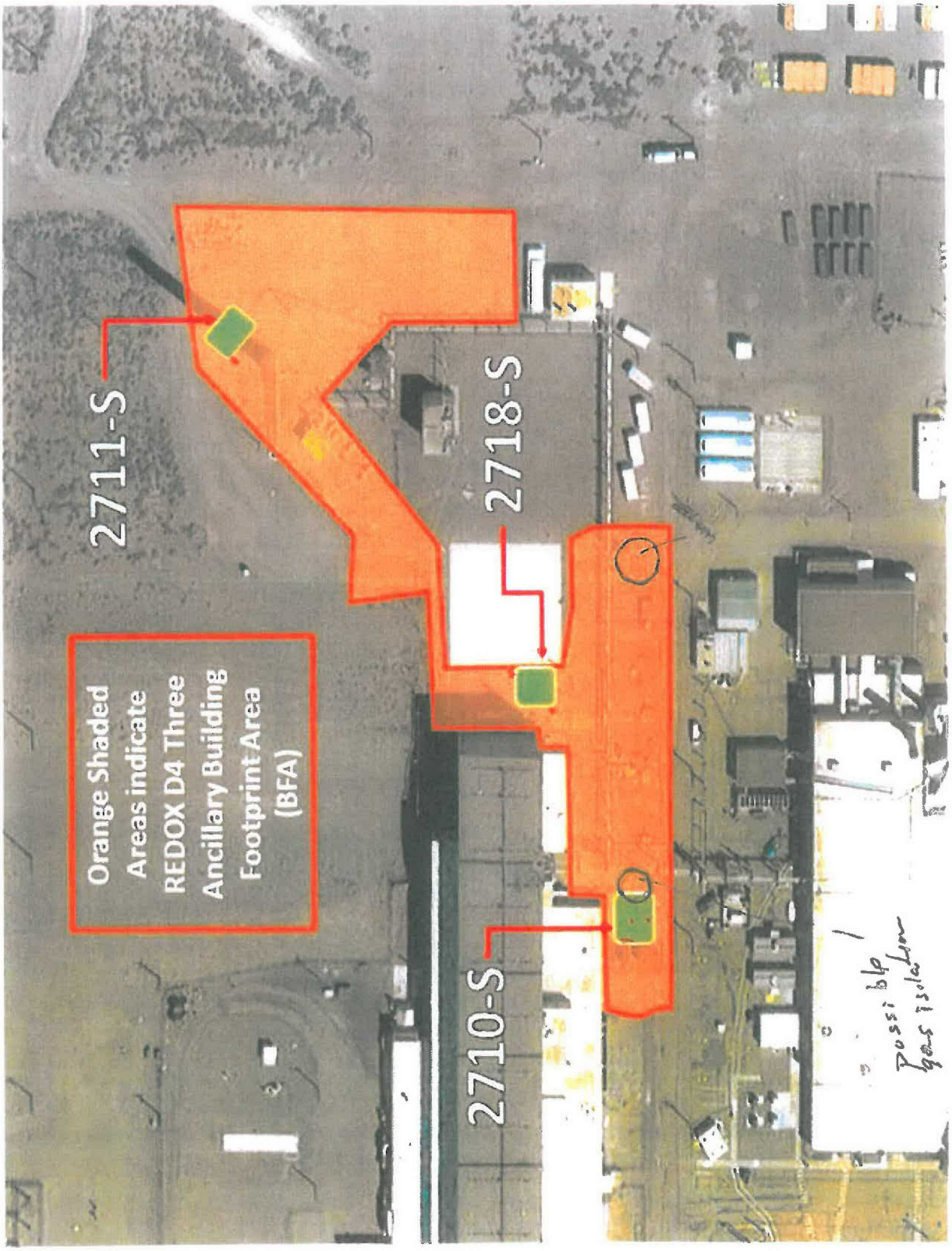
Raymond T Swenson
R. T. Swenson, Senior Counsel
General Counsel
4/12/2016
Date

lmd/drt/sb

Attachment

cc: CHPRC Correspondence Control, G3-39
L. J. Cusack, H8-45
B. H. Dixon, X4-01
R. H. Engelmann, H8-45
R. E. Fox, T4-09
M. N. Jaraysi, H8-43
R. T. Swenson, H8-66
E. D. Trotta, H8-66

CHPRC-1601608
ATTACHMENT



REDOX D4 - THREE ANCILLIARY BUILDING FOOTPRINT AREA

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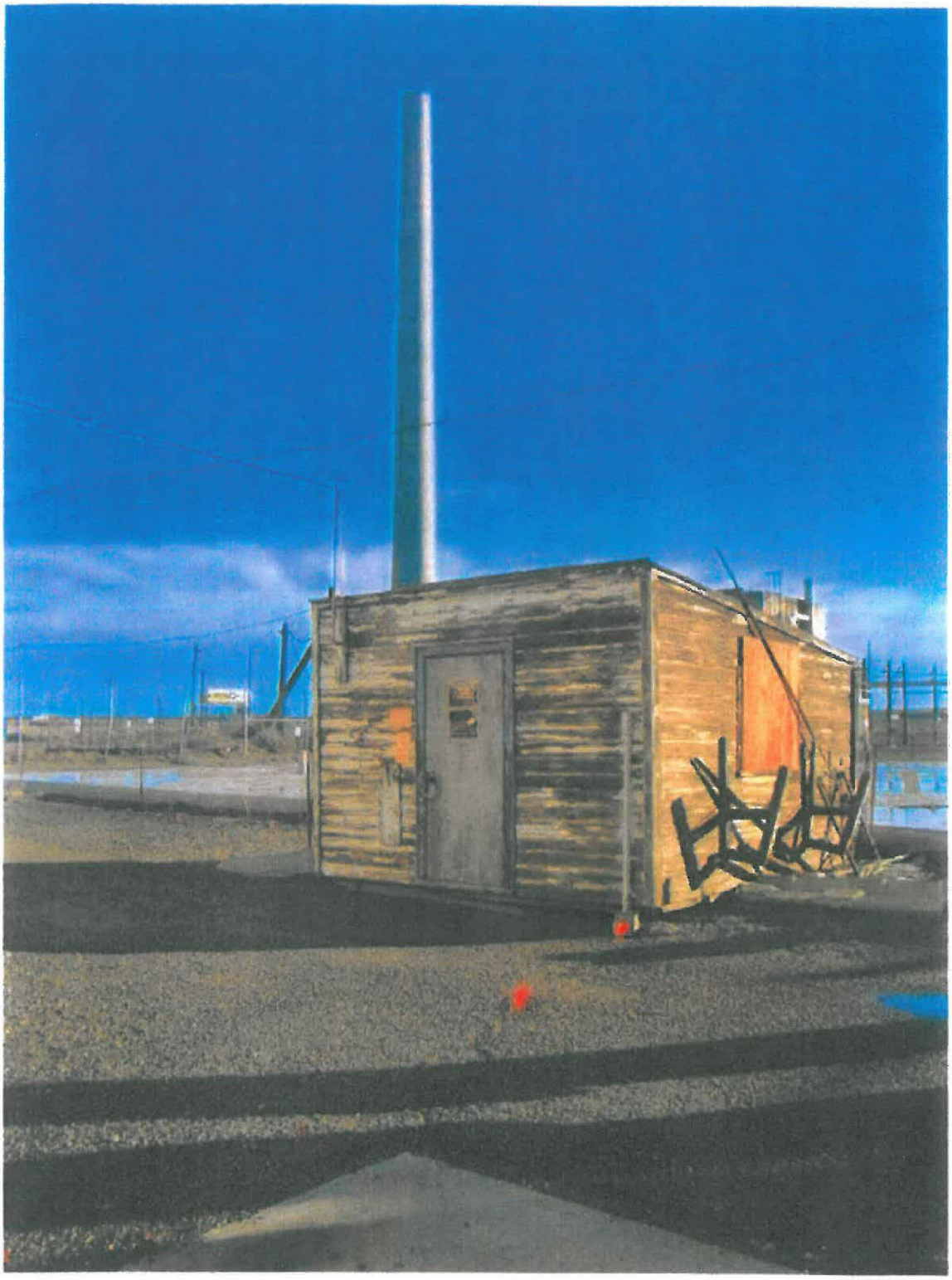
CHPRC-1601608
ATTACHMENT



2718S Sand Filter Sample Building

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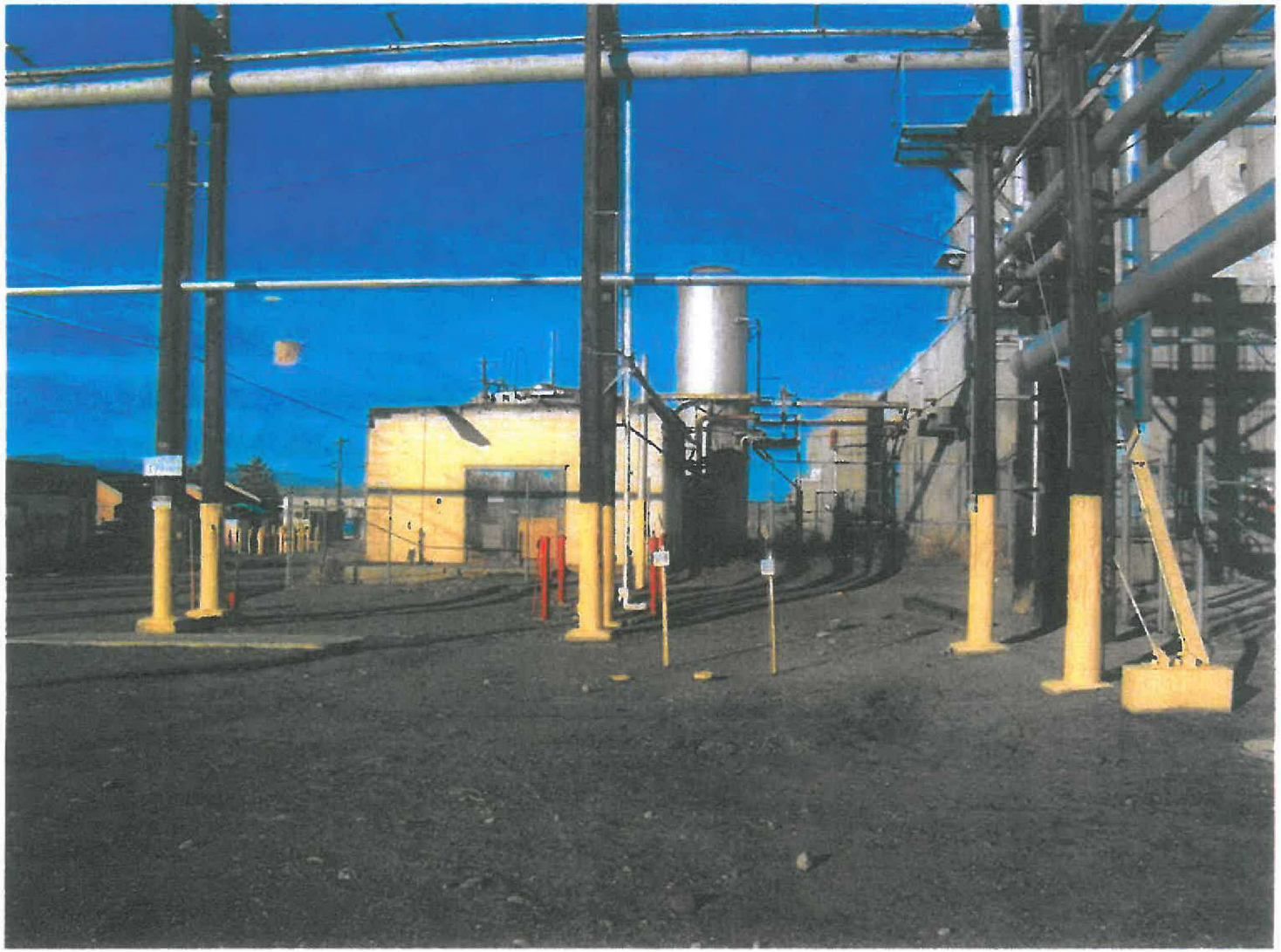
2711S Stack Gas Monitoring Building

CHPRC-1601608
ATTACHMENT



2710S Inert Gas Generator

CH2M HILL PLATEAU REMEDIATION COMPANY RADIOLOGICAL SURVEY REPORT(Submitted for Approval)	RSR No. RC-1601071	Page 1 of 5

Date	Start/Stop Time	Area/Location	RWP/Rev.
09/07/2016	0930/1030	200W / 2718S / Redox 2718s building foot print.	N/A

Purpose of Survey:

☐ Material Clearance
Number: N/A
Cleared to: N/A

☐ Ram Shipment: N/A

☐ Required Task: N/A

X Job Coverage: CP-16-01147/W

☐ Verification survey α = <D
<D=No increase in audible count rate

N/A Inches/Sec. N/A Inches Away
N/A Count Time (Sec.) N/A % Surveyed
N/A # of Static Counts N/A Square Feet

☐ Verification survey βγ = <D
<D=No increase in audible count rate

N/A Inches/Sec. N/A Inches Away
N/A Count Time (Sec.) N/A % Surveyed
N/A # of Static Counts N/A Square Feet

☐ Other:
N/A

Description of Work:

Redox 2718s, post demolition foot print survey.

Comments:

Redox 2718s, post demolition foot print survey.

-Smear survey taken on concrete slab.

-Transferability survey performed every square meter.

-No contamination levels found above table 2-2.

CH2M HILL PLATEAU REMEDIATION COMPANY RADIOLOGICAL SURVEY REPORT(Submitted for Approval)	RSR No. RC-1601071	Page 2 of 5

Dose Rate Measurements

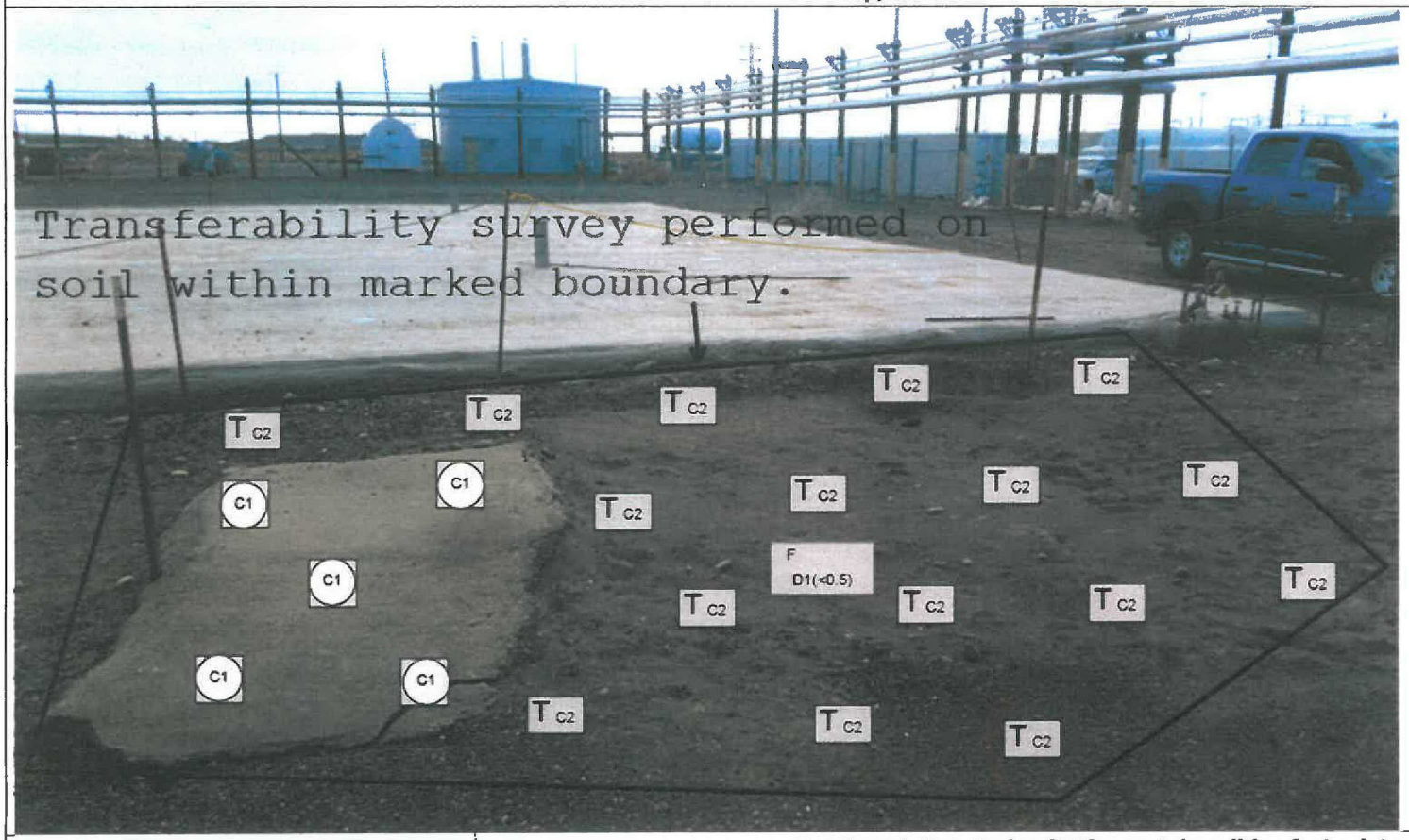
No.	Description	Note[1]: F = Field (>=30 cm) C = Contact (<=1 cm) H = HEBE							
		Dist. (cm) Note[1]	WO mR/hr	WC mR/hr	CF Non-Penetrating	CF Penetrating	Neutron Dose mrem/hr	Shallow Dose mrem/hr	Deep Dose mrem/hr
D1	2718s foot print general area.	F	<0.5	<0.5	2	1	N/A	<0.5	<0.5

Contamination Measurements

		* Manually Calculated by RCT												
		Background cpm		Direct Gross cpm/100 cm²		Total dpm/100 cm²		Correction Factor		Removable				
											Gross (cpm)		dpm/100 cm²	
No.	Description	βγ	α	βγ	α	βγ	α	βγ	α	Type	βγ	α	βγ	α
C1	Foot print survey of post demolition 2718s Redox (Highest found reading).	200	3	260	4	600	10	10	10	Smear	250	4	500	10
C2	Foot print soil survey of post demolition 2718s Redox (Highest found reading).	200	3	280	N/A	800	N/A	10	10	Transferable	250	4	500	10

CH2M HILL PLATEAU REMEDIATION COMPANY RADIOLOGICAL SURVEY REPORT(Submitted for Approval)	RSR No. RC-1601071	Page 3 of 5

Map/Sketch



Map Name: 2718s foot print	Map Description: Redox 2718s, post demolition foot print survey.

Legend	Direct Measurement	Air Sample	Smear	LAW	Neutron Dose Rate	Transferability	Field	Contact	Other Distance	Other Measurement
	#	#	#	L#	#	T#	F#	C#	D#	O#

---------- (designation inside) ---------- Radiological Area Boundary

Note: Dose Rates in mrem/hr unless otherwise noted.

Instruments

Instrument Type	Bar Code No.	Probe Bar Code No.	Efficiency (Used)	Due Date
LUDLUM 2360 / 43-93	SCLL8-0432	DTLLP-0539	0.1	10/29/2016
LUDLUM 2360 / 43-93	SCLL8-0546	DTLLP-0638	0.1	11/05/2016

CH2M HILL PLATEAU REMEDIATION COMPANY RADIOLOGICAL SURVEY REPORT(Submitted for Approval)			RSR No. RC-1601071	Page 4 of 5
RO-20	ICEB4-1364	N/A	N/A	01/19/2017
Unless stated otherwise in the "Comments" section, contamination levels for C-14, Fe-55, Ni-59, Ni-63, Se-79, Tc-99, Pd-107, and Eu-155 are <= 10 times the b-g contamination levels shown above (see CHPRC-00073, Table 2-2).				
History				
9/7/2016 1:38:17 PM - Cox , Michael - Submitted: 9/7/2016 2:12:31 PM - Cox , Michael - Unsubmit: Clarification 9/7/2016 2:26:10 PM - Cox , Michael - Submitted: 9/7/2016 2:30:02 PM - BIGGS , DANIEL - Final Approval:				

*** Electronically Approved – RC-1601071 on 09/7/2016 ***:*

User: Cox, Michael (h2777361)
Title: Owner
Date: Wednesday, September 07, 2016, 2:26 PM Pacific Standard Time
==========
User: Keaton, Ronald (h7955541)
Title: Contributor
Date: Wednesday, September 07, 2016, 2:27 PM Pacific Standard Time
==========

User: BIGGS, DANIEL (h6820981)
Title: Reviewer
Date: 9/7/2016 2:30:02 PM Pacific Standard Time
==========

List of 2718S Radiological Survey Reports

Survey Number	Date	Status	Facility Code	Building	Description
RC-1600423	04/27/2016	Verified	RC	2718S	Redox buildings outside support
RC-1600428	04/27/2016	Verified	RC	2718S	Stabilize roof in 2718-S building
RC-1600477	05/09/2016	Verified	RC	2718S	Entry into 2718-S REDOX ancillary building
RC-1600499	05/12/2016	Verified	RC	2718S	2718-S shipment for air sample
RC-1600500	05/12/2016	Verified	RC	2718S	RBA / Step-Off pad survey for support at 2718-S
RC-1600501	05/12/2016	Verified	RC	2718S	Removal of electrical hook ups for building 2718s.
RC-1600530	05/18/2016	Verified	RC	2718S	Vacuum line removal
RC-1600532	05/19/2016	Verified	RC	2718S	SOP support for Mechanical Isolation of 2718S pipe conduit removal of wood shack
RC-1600755	07/06/2016	Verified	RC	2718S	IH sampling
RC-1600778	07/12/2016	Verified	RC	2718S	Redox 2718 SOP clearance survey, external building, and blue card shipment of air samples.
RC-1600899	08/04/2016	Verified	RC	2718S	Blue card air sample shipment. From Redox 2718S to 2269E RCT count lab.
RC-1600905	08/04/2016	Verified	RC	2718S	building demo 2718-S REDOX ancillary building
RC-1600913	08/08/2016	Verified	RC	2718S	D4 Temporary RMA/RBA Weekly Survey
RC-1600919	08/09/2016	Verified	RC	2718S	# Roll off cans from 2811S
RC-1600921	08/09/2016	Verified	RC	2718S	Blue card
RC-1600922	08/09/2016	Verified	RC	2718S	Demolition/Survey of Bldg. 2718S Area.
RC-1600928	08/11/2016	Verified	RC	2718S	building demo 2718-S
RC-1600929	08/11/2016	Verified	RC	2718S	Blue Card
RC-1600941	08/15/2016	Verified	RC	2718S	2718-S Building Demo Cleanup
RC-1600945	08/16/2016	Verified	RC	2718S	Blue card air sample shipment. From2718-S to 2269E RCT count lab.
RC-1600946	08/16/2016	Verified	RC	2718S	2718-S post job clean up, and down post survey.
RC-1500913	12/01/2015	Verified	RC	2718 S	REDOX/ 2718S inspection

Turlington, Daniel R

From: Barry, Henry T
Sent: Tuesday, August 02, 2016 10:42 AM
To: Turlington, Daniel R
Cc: Werry, Scott M
Subject: FW: PLANNED DEMOLITION WITH CATEGORY I NONFRIABLE ACM IN PLACE

FYI

From: Faulk, Dennis [mailto:Faulk.Dennis@epa.gov]
Sent: Wednesday, July 27, 2016 7:59 AM
To: Toebe, Wayne E
Cc: Prichard, Earl A ; Turlington, Daniel R ; Karschnia, Paul T ; McKenney, Dale E ; Faust, Eric T ; Farabee, Oliver A (Al) ; Woolery, Wade C ; Barry, Henry T ; Dixon, Brian J ; Collins, Michael S ; Corriell, Darin R ; Cameron, Craig (EPA)
Subject: Re: PLANNED DEMOLITION WITH CATEGORY I NONFRIABLE ACM IN PLACE

Wayne

The proposal looks fine. As a side you No longer need to seek EPA approval for this work. That was a short term requirement as the documents were updated. As always If tough issues come up John Pavitt is ready to assist us.

Sent from my iPhone

On Jul 26, 2016, at 2:03 PM, Toebe, Wayne E <Wayne_E_Toebe@rl.gov> wrote:

> Hello Dennis,
>
> Please see the summary information below regarding upcoming demolition work near REDOX at 2711S and 2718S. We have identified Category I nonfriable ACMs through inspection that we would like to leave in place during the work.
>
> At this time, we are requesting concurrence from EPA that the Category I nonfriable ACM will not be rendered friable by the planned demolition approach for the three facilities identified below. The demolition controls have been developed to ensure that Category I nonfriable ACM will not be rendered friable by the methods applied.
>
> **2711S and 2718S**: Both buildings are approximately 175 ft^2 structures and both were built in 1952. 2711S was used for monitoring and storage of samples from the 291-S-1 stack. 2718S was used to monitor the quality of exhaust air for the 291S sand filter. The two buildings contain

minimal amounts of ACM in caulking materials and electrical conduit that is not in poor condition. The total amount in both buildings is less than 20 linear feet of caulking and less than 7 linear feet of wire insulation enclosed in conduit. The project plans to leave these Category I nonfriable ACMs in place during demolition.

The 2711S/2718S demolition activities and associated waste handling activities such as segregation, consolidation, and reduction will not include any sanding, grinding, cutting, or abrading of ACM. Water with surfactant will be used during the demolition and waste handling processes to keep dirt and dust down. Reduction of the building by the excavator will be minimized to the extent needed to load the material safely for transport. Fixatives will be used on asbestos-containing waste materials that remain overnight at the demolition site.

We would be glad to come to your office to discuss these planned building demolitions and the associated Category I nonfriable ACMs if you would like.

Thank you,
Wayne Toebe, CHPRC Environmental Protection
521-0333

FROM EPA-340-1-92-013, DEMOLITION PRACTICES UNDER THE ASBESTOS NESHAP:

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